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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN VAN STEENIS, individually,

Plaintiff,

v.

RICKY C. KENDRICK, individually;
UNITED STATES POSTAL SERVICE;
DOES 1-X, and ROE CRPORATIONS
INC.,

Defendants.

Case No. 2:22-cv-00863-MMD-EJY

**Stipulation for Extension of Time for
Defendants to Respond to Plaintiff's
Complaint**

(First Request)

Plaintiff, John Van Steenis, and the United States of America ("United States"), on behalf of Ricky C. Kendrick, individually, and the United States Postal Service, by and through undersigned counsel, hereby stipulate to extend the time for Defendants to respond to Plaintiff's Complaint. The parties stipulate that the time be extended to August 1, 2022 (60¹ days from date of removal). The basis for this stipulation is as follows:

1. This action was originally brought in the Eighth Judicial District, Clark County, Nevada. The named federal defendants are Ricky C. Kendrick and the United States Postal Service.

¹ 60 days from the date of removal, May 31, 2022, is July 30, 2022. July 30, 2022, is a Saturday. In accordance with Fed. R. Civ. P. 6(a)(1)(C), because "the last day is a Saturday . . . the period continues to run until the end of the next day that is not a Saturday, Sunday, or legal holiday." In this case that date would be Monday, August 1, 2022.

2. On May 31, 2022, the United States filed a Notice of Removal, removing the action from state to federal court.

3. Rule 81(c) of the Federal Rules of Civil Procedure provides the time in which a Defendant must answer an initial pleading in a removed action. The time provided is the later of 21 days after receipt or service of the initial pleading or seven days after the removal. *See* Fed. R. Civ. P. 81(c). However, a federal officer or agency would ordinarily be permitted a response time of 60 days following proper service to respond pursuant to the Federal Rules. *See* Fed. R. Civ. P. 12(a)(2).

4. Accordingly, it is proposed, requested, and stipulated that the time within which Defendants are required to respond to Plaintiff's complaint be extended to August 1, 2022—a date that is 60 days following the date of removal.

5. The usual sixty-day response time is needed to meaningfully evaluate the allegations of the Complaint and prepare a response to that pleading.

Respectfully submitted this 7th day of June 2022.

The Powell Law Firm

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/s/ Tom Stewart

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IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Dated: June 7, 2022